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March 19, 2025

Magistrate Judge James B. Clark, III
United States District Court, District of New Jersey
50 Walnut Street
Courtroom MLK 2A
Newark, New Jersey 07101

Re: The Estate of Carlos Borroto et als. v. CFG Health Systems, et. als.
Civil Action No.: 19-17148-JMV-JBC

Honorable Sir:

We represent the plaintiff with respect to the above-referenced matter.

Motions for summary judgment filed by the defendants were denied by Hon. Madeline Cox Arleo, U.S.D.J. by Order dated September 27, 2024. Within that order, Judge Arleo referred the matter to Your Honor to set deadlines for *Daubert* motions and for settlement discussions. (ECF Doc. # 104).

A settlement conference was held via Zoom on October 8, 2024 before Your Honor. Unfortunately, this settlement conference did not result in settlement.

To date, this matter is not settled and no *Daubert* motions, mediation, trial date or pre-trial schedule has been set by the Court. The parties have discussed private mediation, which plaintiff and two of the four defendants wish to pursue. However, to date we have not been able to obtain responses and agreement of all defendants, therefore we seek the Court's guidance and assistance in this matter.

The plaintiff has circulated this proposed request to all parties.

Thank you for your consideration.

Respectfully submitted,

s/ Lorne M. Reiter

LORNE M. REITER

LMR:lcj

cc: *All counsel of record via ECF*